IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: John H. Yoakum et al.   Examiner: Walter F. Briney, III
Serial No. 10/647,999   Art Unit: 2646
Filed: 08/26/2003
For: **IP-CENTRIC SPEED DIAL**

Mail Stop Appeal Brief – Patents
Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

Sir:

       The present **REVISED APPEAL BRIEF** is filed pursuant to 37 C.F.R. § 41.37(c)(1)(v) to address the Notification of Non-Compliant Appeal Brief mailed October 13, 2006 by amending section (5) SUMMARY OF CLAIMED SUBJECT MATTER to provide mapping of the independent claims. Appellant has previously paid for the Appeal Brief, so no new fee should be required. If any additional fees are required in association with this appeal brief, the Director is hereby authorized to charge them to Deposit Account 50-1732, and consider this a petition therefor.

(1) REAL PARTY IN INTEREST

The real party in interest is the assignee of record, i.e., Nortel Networks Limited of 2351 Boulevard Alfred-Nobel, St. Laurent, Quebec Canada H4S 2A9, which is wholly owned by Nortel Networks Corporation, a Canadian corporation.

(2) RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences to the best of Appellant's knowledge.

(3) STATUS OF CLAIMS

Claims 1-39 were rejected with the rejection made final on October 31, 2005.

Claims 1-39 are pending and are the subject of this appeal.

(4) STATUS OF AMENDMENTS

All amendments have been entered to the best of Appellant's knowledge.

(5) SUMMARY OF CLAIMED SUBJECT MATTER

The present invention provides speed dial capability for PSTN-based telephony devices 12, which are coupled to a terminal adaptor 18 to facilitate calls over a packet network 16 (Specification, paragraph 0007). The claimed "speed dial code" is distinguished from the well-known "speed dial number." In operation, the terminal adaptor 18 will receive a speed dial code, such as 12#, from the PSTN-based telephony device 12 and use the speed dial code to attempt to initiate a session over the packet network 16 (Specification, paragraph 0007). Importantly, the speed dial code is an abbreviated telephone number sequence and is not a pre-stored telephone number that is typically referred to as the speed dial number (Specification, paragraph 0018). A calling party proxy 20 will intercept the session request, recognize the speed dial code in the session request, and access an address, such as a Uniform (or Universal) Resource Locator (URL), IP address, or like identifier, associated with the speed dial code. The calling party proxy 20 will then use the address corresponding to the speed dial code to initiate the session between the terminal adaptor 18 and another device to facilitate the call (Specification, paragraph 0018). The terminal adaptor 18 will provide the necessary translation between the packet network 16

and the PSTN-based telephony interface to which the PSTN-based telephony device 12 is coupled (Specification, paragraph 0026). The calling party proxy 20 functionality may be implemented in a separate device or within the terminal adaptor 18 itself (Specification, paragraph 0026). Providing speed dial capability for the PSTN-based telephony device 12 that is connected to the terminal adaptor 18 to facilitate packet-based calls overcomes the complexity and difficulty associated with entering addresses for called parties, especially when the address includes characters other than numeric characters. (Specification, paragraph 0007).

In particular, claim 1 recites the claimed invention from the network/proxy perspective. Claim 1 recites a method of facilitating speed dialing comprising:

a)   accessing an address corresponding to a speed dial code (Figure 2, step 100) that comprises an abbreviated telephone number sequence, said speed dial code being initially dialed from a PSTN-based telephony device (such as device 12, Figure 1) (Specification, paragraphs 0007, 0018, and 0025; see also Figure 2, steps 102-108); and

b)   sending a session initiation request including the address to initiate a voice session between a called party terminal (such as called party terminal 14, Figure 1) associated with the address and the PSTN-based telephony device (Specification, paragraphs 0007, 0018, and 0026; see also Figure 2, steps 110-114).

Claim 9 is similar to claim 1, but from the terminal adaptor perspective. Claim 9 recites a method of facilitating speed dialing comprising:

a)   receiving a speed dial code (Figure 2, step 100) from a PSTN-based telephony device (such as device 12, Figure 1), wherein the speed dial code comprises an abbreviated telephone number sequence (Specification, paragraphs 0007, 0018, and 0025; see also Figure 2, steps 102-108);

b)   sending an initial session initiation request (such as INVITE, see Figure 2, step 112) including the speed dial code over an Internet Protocol based network (such as IP network 16, Figure 1) (Specification, paragraphs 0007, 0018, and 0026; see also Figure 2, steps 110-114); and

c)   facilitating a voice session over the Internet Protocol based network with a called party terminal (such as terminal 14, Figure 1) and a voice connection with the PSTN-based telephony device to facilitate a call between the PSTN-based telephony device and the called

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party terminal (Specification, paragraphs 0007, 0016, 0018, and 0026; see also Figure 2, steps 120-124).

Claim 12 recites a system for facilitating speed dialing comprising:

a) at least one communication interface (such as IP network interface 42, Figure 4; see also Specification, paragraph 0028); and

b) a control system (such as control system 36, Figure 4; see also Specification, paragraph 0028) associated with the at least one communication interface and adapted to:

i) access an address corresponding to a speed dial code (Figure 2, step 100) comprising an abbreviated telephone number sequence, said speed dial code being initially dialed by a user of a PSTN-based telephony device (such as device 12, Figure 1) (Specification, paragraphs 0007, 0018, and 0025; see also Figure 2, steps 102-108); and

ii) send a session initiation request including the address to initiate a voice session between a called party terminal (such as called party terminal 14, Figure 1) associated with the address and the PSTN-based telephony device (Specification, paragraphs 0007, 0018, and 0026; see also Figure 2, steps 110-114).

Claim 20 recites a system for facilitating speed dialing comprising:

a) an Internet Protocol communication interface (such as IP network interface 32, Figure 3; see also Specification, paragraph 0027);

b) a PSTN-based telephony network interface (such as traditional telephony interface 34, Figure 3; paragraph 0027) supporting a PSTN-based telephony device (such as device 12, Figure 1); and

c) a control system (such as control system 26, Figure 3) associated with the Internet Protocol communication interface and the PSTN-based telephony interface (Specification, paragraph 0027) and adapted to:

i) receive a speed dial code (Figure 2, step 100) from the PSTN-based telephony device (such as device 12, Figure 1), wherein the speed dial code comprises an abbreviated telephone number sequence (Specification, paragraphs 0007, 0018, and 0025; see also Figure 2, steps 102-108);

ii) send an initial session initiation request (such as INVITE, see Figure 2, step 112) including the speed dial code over an Internet Protocol based network (such as

IP network 16, Figure 1) (Specification, paragraphs 0007, 0018, and 0026; see also Figure 2, steps 110-114); and

       iii)   facilitate a voice session over the Internet Protocol based network with a called party terminal (such as terminal 14, Figure 1) and a voice connection with the PSTN-based telephony device to facilitate a call between the PSTN-based telephony device and the called party terminal (Specification, paragraphs 0007, 0016, 0018, and 0026; see also Figure 2, steps 120-124).

Claim 23 recites a method of facilitating speed dialing comprising:

       a)   accessing an address corresponding to a speed dial code (Figure 2, step 100) comprising an abbreviated telephone number sequence, said speed dial code being initially dialed by a user of a telephony device (such as device 12, Figure 1) having a primarily numeric keypad (such as packet telephony terminal 44 having basic numeric telephony interface 46 (Figure 5; see also Specification, paragraph 0029)) (Specification, paragraphs 0007, 0018, and 0025; see also Figure 2, steps 102-108); and

       b)   sending a session initiation request including the address to initiate a voice session between a called party terminal (such as called party terminal 14, Figure 1) associated with the address and the telephony device (Specification, paragraphs 0007, 0018, and 0026; see also Figure 2, steps 110-114).

Claim 30 recites a system for facilitating speed dialing comprising:

       a)   at least one communication interface (such as IP network interface 54, Figure 5; see also Specification, paragraph 0028); and

       b)   a control system (such as control system 48, Figure 5; see also Specification, paragraph 0028) associated with the at least one communication interface and adapted to:

       i)   access an address corresponding to a speed dial code (Figure 2, step 100) comprising an abbreviated telephone number sequence, said speed dial code being initially entered by a user via a primarily numeric keypad of a telephony device (such as packet telephony terminal 44 having basic numeric telephony interface 46 (Figure 5; see also Specification, paragraph 0029)) (Specification, paragraphs 0007, 0018, and 0025; see also Figure 2, steps 102-108); and

       ii)   send a session initiation request including the address to initiate a voice session between a called party terminal (such as called party terminal 14, Figure 1)

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associated with the address and the telephony device (Specification, paragraphs 0007, 0018, and 0026; see also Figure 2, steps 110-114).

Claim 37 recites a system for facilitating speed dialing comprising:

a)　an Internet Protocol communication interface (such as IP network interface 54, Figure 5; see also Specification, paragraph 0027);

b)　a primarily numeric keypad (see basic numeric telephony interface 46 of packet telephony terminal 44, Figure 5; see also Specification, paragraph 0029); and

c)　a control system (such as control system 48, Figure 5) associated with the Internet Protocol communication interface and the primarily numeric keypad and adapted to:

i)　receive a speed dial code (Figure 2, step 100) entered via the primarily numeric keypad, wherein the speed dial code comprises an abbreviated telephone number sequence (Specification, paragraphs 0007, 0018, and 0025; see also Figure 2, steps 102-108);

ii)　send an initial session initiation request (such as INVITE, see Figure 2, step 112) including the speed dial code over an Internet Protocol based network (such as IP network 16, Figure 1) (Specification, paragraphs 0007, 0018, and 0026; see also Figure 2, steps 110-114); and

iii)　facilitate a voice session over the Internet Protocol based network with a called party terminal (such as terminal 14, Figure 1) (Specification, paragraphs 0007, 0016, 0018, and 0026; see also Figure 2, steps 120-124).

(6) GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

1)　Whether the Patent Office has improperly construed the term "speed dial number" in Takemoto as the term "speed dial code" as claimed by the Applicant.

2)　Whether the rejections of claims 1-39 in light of Strathmeyer et al. (hereinafter "Strathmeyer") and Takemoto et al. (hereinafter "Takemoto") are proper.

(7) ARGUMENT

A. Introduction

The Patent Office has improperly construed the meaning of the term "speed dial code." Each of the pending claims define the speed dial code as an abbreviated telephone number

sequence. The abbreviated telephone number sequence corresponds to an address, such as a URL, IP address, or like identifier. The Patent Office is improperly relying on Takemoto as disclosing the speed dial code. Takemoto discloses a speed dial number, which is different than the claimed speed dial code. The speed dial number of Takemoto is a telephone number, which is pre-stored in its entirety in a telephone or facsimile machine. A user action may trigger dialing of the pre-stored number by the telephone or facsimile machine. Notably, there is nothing in Takemoto that indicates the pre-stored number is an abbreviated telephone number sequence. In essence, neither Strathmeyer nor Takemoto discloses use of the speed dial code as described and claimed by the Appellant.

B. Summary of the References

1. U.S. Patent Application No. 2004/0120502 to Strathmeyer

Strathmeyer discloses a system for routing calls between an external network domain 160 and an internal network domain 170, which is coupled together by a gateway 120. Various agent endpoints 145 are associated with a call control proxy server 130, which acts as a communication proxy for facilitating calls on behalf of the agent endpoints 145. A softswitch 125 is provided as a liaison between the gateway 120 and the call control proxy server 130. These entitities cooperate to provide call routing, queuing, and other call processing for packet-based communication sessions. The softswitch 125 may provide address resolution or translation for calls between the agent endpoints 145 and other endpoints, such as callers 110. (See Figure 1 and the associated text between paragraphs 0034 and 0046 of Strathmeyer).

2. U.S. Patent Application No. 2003/0023748 to Takemoto

Takemoto provides an Internet communication control apparatus 1 associated with a telephone 2 and a facsimile apparatus 3. The Internet communication control apparatus 1 is connected to the Internet 5 through a local area network (LAN) 4 into the telephone 2 and facsimile apparatus 3 through an analog connection. When either the telephone 2 or facsimile apparatus 3 initiate a call, the Internet communication control apparatus 1 will recognize the telephone number dialed by the telephone 2 or the facsimile apparatus 3, and look-up an appropriate IP address or mail address associated with the number being dialed. (See the Abstract of Takemoto). Takemoto provides a table 15 having phone numbers or speed dial

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numbers corresponding to the IP addresses or mail addresses from transmission requests from the telephone 2 or the facsimile apparatus 3. In context, the use of the term "speed dial number" appears to be what is traditionally referred to as a speed dial number. As such, the speed dial number is a stored telephone number, which may be automatically dialed in response to a user taking a specific action at the facsimile apparatus 3. There is no indication or suggestion that the speed dial number of Takemoto is a speed dial code that comprises an abbreviated telephone number sequence, such as that claimed in Appellant's application.

C. The Standards for Establishing Obviousness

Section 103(a) of the Patent Act provides the statutory basis for an obviousness rejection and reads as follows:

> A patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 of this title, if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious to a person having ordinary skill in the art to which said subject matter pertains. Patentability shall not be negatived by the manner in which the invention was made.

Courts have interpreted 35 U.S.C. § 103(a) as being a question of law based on underlying facts. As the Federal Circuit stated:

> Obviousness is ultimately a determination of law based on underlying determinations of fact. These underlying factual determinations include: (1) the scope and content of the prior art; (2) the level of ordinary skill in the art; (3) the differences between the claimed invention and the prior art; and (4) the extent of any proffered objective indicia of nonobviousness.

Monarch Knitting Mach. Corp. v. Sulzer Morat GmBH, 139 F.3d 877, 881 (Fed. Cir. 1998) (internal citations omitted).

The burden is on the Patent Office to establish a *prima facie* case of obviousness. *In re Fine*, 837 F.3d 1071, 1074 (Fed. Cir. 1988). "To reach a proper conclusion under § 103, the decisionmaker must step backward in time and into the shoes worn by [a person having ordinary skill in the art] when the invention was unknown and just before it was made." *Id.* at 1073 (quoting *Panduit Corp. v. Dennison Mfg. Co.*, 810 F.2d 1561, 1566 (Fed. Cir. 1987) (paraphrase in *Fine*'s original text)). "One cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention." *In re Fine* at 1075.

The "case law makes clear that the best defense against the subtle but powerful attraction of a hindsight-based obviousness analysis is rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references." *In re Dembiczak*, 175 F.3d 994, 999 (Fed. Cir. 1999). "Combining prior art references without evidence of such a suggestion, teaching, or motivation simply takes the inventor's disclosure as a blueprint for piecing together the prior art to defeat patentability - the essence of hindsight." *Ibid.*

The Federal Circuit notes

> that evidence of a suggestion, teaching, or motivation to combine may flow from the prior art references themselves, the knowledge of one of ordinary skill in the art, or, in some cases, from the nature of the problem to be solves . . . The range of sources available, however, does not diminish the requirement for actual evidence. That is, the showing must be clear and particular. Broad conclusory statements regarding the teaching of multiple references, standing alone, are not "evidence."

Ibid (internal citations omitted). It is worth noting that the *Dembiczak* court specifically acknowledged *Fine*, but emphasized the requirement for actual evidence in proving the motivation to combine the references.

For a *prima facie* case of obviousness, the combination must teach or fairly suggest all the claim elements. *In re Royka*, 490 F.2d 981 (CCPA 1974); MPEP § 2143.03. If the Patent Office fails to establish obviousness, then the Appellant is entitled to a patent. *In re Glaug*, 283 F.3d 1335, 1338 (Fed. Cir. 2002).

D. Claims 1-39 Are Non-Obvious Because the Combination of References is Improper

The Patent Office is misconstruing the term "speed dial number" in Takemoto as the "speed dial code" in each of Appellant's independent claims 1, 9, 12, 20, 23, 30, and 37. The speed dial number in Takemoto is only mentioned once, and there is no suggestion that the speed dial number is a speed dial code comprising an abbreviated telephone number sequence. In context, the speed dial number of Takemoto is merely a telephone number, which is stored in a telephone or facsimile machine, wherein a user may take some action, such as erasing a key or entering a code, to have the telephone or facsimile machine automatically dial the full speed dial number. This is the common meaning of a speed dial number. As such, the telephone number dialed is the speed dial number, and not an abbreviated telephone number sequence. In the

claimed invention, the abbreviated telephone number sequence (speed dial) code is dialed. An example speed dial code is 12# as provided in paragraph 0025 of Appellant's application, as opposed to a full telephone number.

As such, Takemoto fails to teach or fairly suggest the use of a speed dial code, as claimed by the Appellant. Construing the speed dial number of Takemoto as the speed dial code claimed by the Appellant is improper and can only be based on hindsight. As noted above, the Patent Office is not allowed to rely on hindsight to breathe unwarranted interpretations into the cited art. Further, the Patent Office admits that Strathmeyer fails to disclose a speed dial code that comprises an abbreviated telephone number sequence (Office Action mailed October 31, 2005 page 3, lines 5-6). Since the combination of Strathmeyer and Takemoto fails to teach or fairly suggest all of the claimed elements, *prima facie* obviousness has not been established. Independent claims 1, 9, 12, 20, 23, 30, and 37 define patentable subject matter. Dependent claims 2-8, 10, 11, 13-19, 21, 22, 24-29, 31-36, 38, and 39 also define patentable subject matter.

E. Conclusion

The Patent Office has not established *prima facie* obviousness for claims 1-39 in light of the Strathmeyer and Takemoto references. Neither reference teaches nor suggests a speed dial code. As such, Appellant requests that the Board reverse the Examiner and instruct the Examiner to allow the claims.

Respectfully submitted,

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(8) APPENDIX

1.   A method of facilitating speed dialing comprising:

   a)   accessing an address corresponding to a speed dial code that comprises an abbreviated telephone number sequence, said speed dial code being initially dialed from a PSTN-based telephony device; and

   b)   sending a session initiation request including the address to initiate a voice session between a called party terminal associated with the address and the PSTN-based telephony device.

2.   The method of claim 1 further comprising receiving an initial session initiation request including the speed dial code.

3.   The method of claim 2 wherein the initial session initiation request is received over an Internet Protocol based network from a terminal adapter, which operatively connects the PSTN-based telephony device to the Internet Protocol based network.

4.   The method of claim 2 wherein the speed dial code is provided in a first field of the initial session initiation request, the first field intended to contain the address.

5.   The method of claim 4 further comprising determining that the first field of the initial session initiation request includes the speed dial code instead of the address.

6.   The method of claim 5 further comprising replacing the speed dial code in the initial session initiation request with the address to create the session initiation request.

7.   The method of claim 6 further comprising:

   a)   receiving a second session initiation request, which includes a second address in the first field; and

   b)   sending the second session initiation request including the second address to initiate a second voice session.

8.   The method of claim 1 further comprising accessing the speed dial code by:

a)   requesting the address using the speed dial code from a directory information database; and

b)   receiving the address from the directory information database.

9.   A method of facilitating speed dialing comprising:

a)   receiving a speed dial code from a PSTN-based telephony device, wherein the speed dial code comprises an abbreviated telephone number sequence;

b)   sending an initial session initiation request including the speed dial code over an Internet Protocol based network; and

c)   facilitating a voice session over the Internet Protocol based network with a called party terminal and a voice connection with the PSTN-based telephony device to facilitate a call between the PSTN-based telephony device and the called party terminal.

10.   The method of claim 9 wherein the speed dial code is provided in a first field of the initial session initiation request, the first field intended to contain an address associated with the called party terminal.

11.   The method of claim 9 wherein the speed dial code is received from the PSTN-based telephony device over a PSTN-based telephony line in the form of dialed digits.

12.   A system for facilitating speed dialing comprising:

a)   at least one communication interface; and

b)   a control system associated with the at least one communication interface and adapted to:

i)   access an address corresponding to a speed dial code comprising an abbreviated telephone number sequence, said speed dial code being initially dialed by a user of a PSTN-based telephony device; and

ii)   send a session initiation request including the address to initiate a voice session between a called party terminal associated with the address and the PSTN-based telephony device.

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13.   The system of claim 12 wherein the control system is further adapted to receive an initial session initiation request including the speed dial code.

14.   The system of claim 13 wherein the initial session initiation request is received over an Internet Protocol based network from a terminal adapter, which operatively connects the PSTN-based telephony device to the Internet Protocol based network.

15.   The system of claim 13 wherein the speed dial code is provided in a first field of the initial session initiation request, the first field intended to contain the address.

16.   The system of claim 15 wherein the control system is further adapted to determine that the first field of the initial session initiation request includes the speed dial code instead of the address.

17.   The system of claim 16 wherein the control system is further adapted to replace the speed dial code in the initial session initiation request with the address to create the session initiation request.

18.   The system of claim 17 wherein the control system is further adapted to:
    a)   receive a second session initiation request, which includes a second address in the first field; and
    b)   send the second session initiation request including the second address to initiate a second voice session.

19.   The system of claim 12 wherein to access the speed dial code, the control system is further adapted to:
    a)   request the address using the speed dial code from a directory information database; and
    b)   receive the address from the directory information database.

20. A system for facilitating speed dialing comprising:

   a) an Internet Protocol communication interface;

   b) a PSTN-based telephony network interface supporting a PSTN-based telephony device; and

   c) a control system associated with the Internet Protocol communication interface and the PSTN-based telephony interface and adapted to:

      i) receive a speed dial code from the PSTN-based telephony device, wherein the speed dial code comprises an abbreviated telephone number sequence;

      ii) send an initial session initiation request including the speed dial code over an Internet Protocol based network; and

      iii) facilitate a voice session over the Internet Protocol based network with a called party terminal and a voice connection with the PSTN-based telephony device to facilitate a call between the PSTN-based telephony device and the called party terminal.

21. The system of claim 20 wherein the speed dial code is provided in a first field of the initial session initiation request, the first field intended to contain an address associated with the called party terminal.

22. The system of claim 20 wherein the speed dial code is received from the PSTN-based telephony device over a PSTN-based telephony line in the form of dialed digits.

23. A method of facilitating speed dialing comprising:

   a) accessing an address corresponding to a speed dial code comprising an abbreviated telephone number sequence, said speed dial code being initially dialed by a user of a telephony device having a primarily numeric keypad; and

   b) sending a session initiation request including the address to initiate a voice session between a called party terminal associated with the address and the telephony device.

24. The method of claim 23 further comprising receiving an initial session initiation request including the speed dial code.

25.   The method of claim 24 wherein the initial session initiation request is received over an Internet Protocol based network from the telephony device.

26.   The method of claim 24 wherein the speed dial code is provided in a first field of the initial session initiation request, the first field intended to contain the address.

27.   The method of claim 26 further comprising determining that the first field of the initial session initiation request includes the speed dial code instead of the address.

28.   The method of claim 27 further comprising replacing the speed dial code in the initial session initiation request with the address to create the session initiation request.

29.   The method of claim 23 further comprising accessing the speed dial code by:

        a)   requesting the address using the speed dial code from a directory information database; and

        b)   receiving the address from the directory information database.

30.   A system for facilitating speed dialing comprising:

        a)   at least one communication interface; and

        b)   a control system associated with the at least one communication interface and adapted to:

                i)   access an address corresponding to a speed dial code comprising an abbreviated telephone number sequence, said speed dial code being initially entered by a user via a primarily numeric keypad of a telephony device; and

                ii)   send a session initiation request including the address to initiate a voice session between a called party terminal associated with the address and the telephony device.

31.   The system of claim 30 wherein the control system is further adapted to receive an initial session initiation request including the speed dial code.

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32.   The system of claim 31 wherein the initial session initiation request is received over an Internet Protocol based network from the telephony device.

33.   The system of claim 31 wherein the speed dial code is provided in a first field of the initial session initiation request, the first field intended to contain the address.

34.   The system of claim 33 wherein the control system is further adapted to determine that the first field of the initial session initiation request includes the speed dial code instead of the address.

35.   The system of claim 34 wherein the control system is further adapted to replace the speed dial code in the initial session initiation request with the address to create the session initiation request.

36.   The system of claim 31 wherein to access the speed dial code, the control system is further adapted to:

        a)   request the address using the speed dial code from a directory information database; and

        b)   receive the address from the directory information database.

37.   A system for facilitating speed dialing comprising:

        a)   an Internet Protocol communication interface;

        b)   a primarily numeric keypad; and

        c)   a control system associated with the Internet Protocol communication interface and the primarily numeric keypad and adapted to:

                i)   receive a speed dial code entered via the primarily numeric keypad, wherein the speed dial code comprises an abbreviated telephone number sequence;

                ii)   send an initial session initiation request including the speed dial code over an Internet Protocol based network; and

                iii)   facilitate a voice session over the Internet Protocol based network with a called party terminal.

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38. The system of claim 37 wherein the speed dial code is provided in a first field of the initial session initiation request, the first field intended to contain an address associated with the called party terminal.

39. The system of claim 37 wherein the speed dial code is received from the PSTN-based telephony device over a PSTN-based telephony line in the form of dialed digits.

(9) EVIDENCE APPENDIX

Appellant relies on no evidence, thus this appendix is not applicable.

(10) RELATED PROCEEDINGS APPENDIX

As there are no related proceedings, this appendix is not applicable.

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